

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

STATE OF GEORGIA,

DEFENDANT.

Civil Action No.

1:16-cv-03088-ELR

UNITED STATES’ MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff United States of America (“United States”) respectfully submits this Motion for Partial Summary Judgment and states as follows:

1) This action, filed in 2016, raises important issues of ongoing harm to thousands of public-school students with disabilities who are separated from their general education peers unnecessarily and placed in the Georgia Network for Educational and Therapeutic Support Program (“GNETS Program”).

2) The parties have completed fact discovery and exchanged expert disclosures, and the United States is prepared to proceed expeditiously to trial.

3) To narrow the issues and simplify the presentation at trial, the United States moves for partial summary judgment as to the State of Georgia's administration of the GNETS Program.

4) Pursuant to Local Rule 56.1, the United States is contemporaneously filing herewith a statement of undisputed material facts.

5) The grounds supporting this motion are set forth in the accompanying Memorandum in Support of the United States' Motion for Partial Summary Judgment.

WHEREFORE, in light of the foregoing and the attached Memorandum in Support, the United States respectfully requests that this Court grant its Motion for Partial Summary Judgment.

Respectfully submitted this 21st day of October, 2023.

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L.R. 7.1(D) CERTIFICATION

I certify that this motion has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this brief has been prepared using 14-pt Times New Roman Font.

/s/ Andrea Hamilton Watson
ANDREA HAMILTON WATSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sent counsel of record e-mail notification of such filing.

This 21st day of October, 2023.

/s/ Andrea Hamilton Watson
ANDREA HAMILTON WATSON